

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re the Application of NATALIA  
POTANINA

For an Order to Take Discovery Pursuant  
to 28 U.S.C. § 1782(a)

Misc. Action No. 14 Misc. 31

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DOCUMENT  
ELECTRONICALLY FILED  
DCC #:

~~PROPOSED~~ ORDER TO TAKE  
DISCOVERY UNDER 28 U.S.C. § 1782

2/4/2014

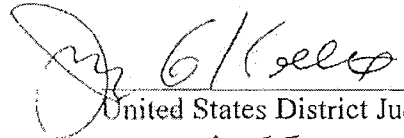
An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from: Altpoint Capital Partners, LLC; Stone Tower Capital LLC; Apollo Global Management LLC; Guerman Aliev; Brett Pertuz; Anish Sheth; and Derek Pease (the "Discovery Respondents") for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina, of Russian Counsel Larisa Ryabchenko, and of Karl Geercken, in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina's Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices*, 542 U.S. 241 (2004), favor the Applicant, it is hereby

ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from the Discovery Respondents pursuant to the Federal Rules of Civil Procedure by

issuing and serving subpoenas *ad testificandum* and *duces tecum* on said Discovery Respondents in the form attached to the Declaration of Karl Geercken, and it is further

ORDERED that if any of the respondents wishes to object to this order or to the subpoenas issued thereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of each subpoena must be served on Mrs. Potanina's attorneys and filed with <sup>the Part I Judge of this Court</sup> ~~this Court~~ within 14 days after service of a subpoena on such respondent.

Entered this 3 day of February, 2014.

  
United States District Judge  
FEB 5 2014

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

In Re the Application of NATALIA  
POTANINA

For an Order to Take Discovery Pursuant  
to 28 U.S.C. § 1782(a)

MISC14

Misc. Action No. \_\_\_\_\_

FILED  
CLERK  
2014 FEB -4 PM 2:23  
U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

VITALIANO, J.

~~PROPOSED~~ ORDER TO TAKE  
DISCOVERY UNDER 28 U.S.C. § 1782

An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from: Prabhkirat (Yuki) Narula and Eric Chan (the "Discovery Respondents") for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina, of Russian Counsel Larisa Ryabchenko, and of Karl Geercken, in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina's Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices*, 542 U.S. 241 (2004), favor the Applicant, it is hereby

ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from the Discovery Respondents pursuant to the Federal Rules of Civil Procedure by issuing and serving subpoenas *ad testificandum* and *duces tecum* on said Discovery Respondents in the form attached to the Declaration of Karl Geercken, and it is further

ORDERED that if any of the respondents wishes to object to this order or to the subpoenas issued thereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of each subpoena must be served on Mrs. Potanina's attorneys and filed with this Court within 14 days after service of a subpoena on such respondent.

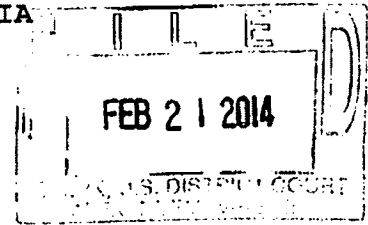
Entered this 4<sup>th</sup> day of February, 2014.

s/Eric N. Vitaliano

~~CHIEF CLERK OF COURT~~

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division



In Re the Application of )  
NATALIA POTANINA )

For an Order to Take )  
Discovery Pursuant to )  
28 U.S.C. s 1782(a) )

Misc. Action No. 1:14-mc-5

ORDER TO TAKE DISCOVERY  
UNDER 28 U.S.C. S 1782

An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from ByteGrid Holdings LLC ("ByteGrid") for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina, of Russian Counsel Larisa Ryabchenko, and of Marianne Casserly, in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina's Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in Intel Corp. v. Advanced Micro Devices, 542 U.S. 241 (2004), favor the Applicant, it is hereby

ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from ByteGrid pursuant to the

Federal Rules of Civil Procedure by issuing and serving a subpoena *ad testificandum* and *duces tecum* on ByteGrid in the form attached to the Declaration of Marianne Casserly, and it is further

ORDERED that if the respondent wishes to object to this order or to the subpoena issued hereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of the subpoena must be served on Mrs. Potanina's attorneys and filed with this Court within 14 days after service of a subpoena on such respondent.

/s/

Claude M. Hilton  
United States District Judge

Alexandria, Virginia  
February 21, 2014

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

In Re the Application of NATALIA  
POTANINA

For an Order to Take Discovery Pursuant  
to 28 U.S.C. § 1782(a)

**5 - 1 4 M C - 0 0 3 - C**

No. \_\_\_\_\_

**ORDER TO TAKE DISCOVERY UNDER 28 U.S.C. § 1782**

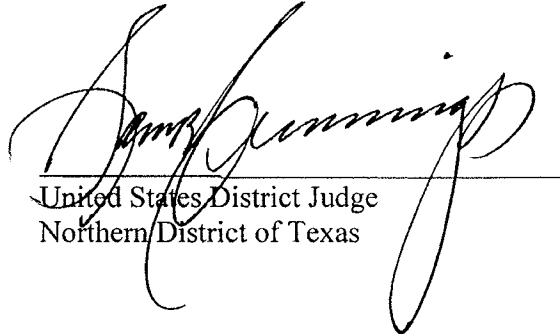
An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from Globe Energy Services LLC (“Globe”), and its principal, Troy Botts, Jr., for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina and Russian Counsel Larisa Ryabchenko in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina’s Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices*, 542 U.S. 241 (2004), favor the Applicant, it is hereby

ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from Globe and Mr. Botts, respectively, pursuant to the Federal Rules of Civil Procedure by issuing and serving the subpoenas *ad testificandum* and *duces tecum* on Globe and Mr. Botts in the form attached to the Application as Exhibits A and B, respectively, and it is further



ORDERED that if the respondents wish to object to this order or to the subpoenas issued hereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of the subpoenas must be served on Mrs. Potanina's attorneys and filed with this Court within 14 days after service of a subpoena on such respondent.

Entered this 12<sup>th</sup> day of February, 2014.



United States District Judge  
Northern District of Texas

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

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*In re*  
Natalia Potanina

§  
§  
§  
§

Miscellaneous H-14-429

Applicant for Discovery,

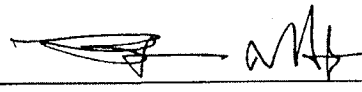
### Order on Discovery

1. Natalia Potanina may subpoena Sanchez Resources, LLC:
  - A. To produce by 5:00 p.m. on February 13, 2014, its records of transactions – direct or indirect – with Altpoint Capital Partners, LLC, Stone Tower Capital LLC, Apollo Global Management LLC, Vladimir Potanin, Guerman Aliev, Brett Pertuz, Anish Sheth, or Derek Pease. It only has to produce records to a reasonable degree of detail, emphatically direct communication with Potanin.
  - B. To depose one corporate representative from Sanchez Resources:

February 14, 2014,  
at 9:00 a.m. in  
Judge Hughes's Jury Room  
United States Court House  
515 Rusk Avenue, Room 11122  
Houston, Texas 77002.

2. These records may only be disclosed to the Presnensky Judicial District 418 Magistrate Court in Moscow, Russia.
3. The United States Marshal will serve the subpoena.

Signed on February 12, 2014, at Houston, Texas.

  
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Lynn N. Hughes  
United States District Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

In Re the Application of NATALIA  
POTANINA

For an Order to Take Discovery Pursuant  
to 28 U.S.C. § 1782(a)

14-50

Misc. Action No. \_\_\_\_\_

~~PROPOSED~~ ORDER TO TAKE  
DISCOVERY UNDER 28 U.S.C. § 1782

An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from Norilsk Nickel USA, Inc. ("Norilsk USA") for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina, Mark Willard, Esq. and Russian Counsel Larisa Ryabchenko in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina's Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices*, 542 U.S. 241 (2004), favor the Applicant, it is hereby

ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from Norilsk USA pursuant to the Federal Rules of Civil Procedure by issuing and serving a subpoena *ad testificandum* and *duces tecum* on Norilsk USA in the form attached to the Application as Exhibit B, and it is further

ORDERED that if the respondent wishes to object to this order or to the subpoena issued hereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of the subpoena must be served on Mrs. Potanina's attorneys and filed with this Court within 14 days after service of a subpoena on such respondent.

Entered this 13 day of February, 2014.

s/Cathy Bissoon

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United States District Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

**FILED**  
FEB 13 2014  
Clerk, U.S. District Court  
District Of Montana  
Billings

In Re the Application of NATALIA  
POTANINA

MCV 14-01-BLG-SPW

For an Order to Take Discovery

ORDER

Pursuant to 28 U.S.C. § 1782(a)

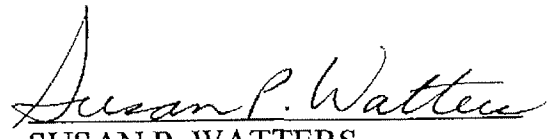
An Application having been made *ex parte* by Natalia Potanina for an Order to take discovery pursuant to 28 U.S.C. § 1782(a) from Stillwater Mining Company ("Stillwater") for potential use in a divorce action filed by her husband in Presnensky District Magistrate Court in Moscow, Russia, and this Court having read the accompanying Declarations of Mrs. Potanina and Russian Counsel Larisa Ryabchenko in support of such Application, and it appearing to the Court in this *ex parte* proceeding that Mrs. Potanina's Application meets the requirements of 28 U.S.C. § 1782(a) and that the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices*, 542 U.S. 241 (2004), favor the Applicant,

IT IS HEREBY ORDERED that Mrs. Potanina is authorized, pursuant to 28 U.S.C. § 1782, to seek discovery from Stillwater pursuant to the Federal Rules of

Civil Procedure by issuing and serving a subpoena *ad testificandum* and *duces tecum* on Stillwater in the form attached to the Application as Exhibit C;

IT IS FURTHER ORDERED that if Stillwater wishes to object to this order or to the subpoena issued hereunder, or to any parts thereof, an appropriate motion to vacate the Order and to quash all or any part of the subpoena must be served on Mrs. Potanina's attorneys and filed with this Court within 14 days after service of a subpoena on such respondent.

DATED this 13th day of February, 2014.

  
SUSAN P. WATTERS  
United States District Judge